

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re	§	
	§	Chapter 11
Alliance Farm and Ranch, LLC,	§	
	§	Case No. 25-30155
Debtor.	§	
	§	

THE OSTRANDER'S
FIRST AMENDED WITNESS AND EXHIBIT LIST
[Relates to ECF No. 29]

Erik and Darla Ostrander (the “Ostranders”), by and through their undersigned counsel, hereby file the following Witness and Exhibit List for the April 9, 2025, 2:00 p.m. hearing:

Case No: 25-30155	Name of Debtor: Alliance Farm and Ranch, LLC
Adversary No: N/A	
Judge: Hon. Alfredo R. Perez	Hearing Date: April 9, 2025
Courtroom Deputy: Akeita House	Hearing Time: 2:00 p.m. CST
Witnesses:	
1. Erik C. Ostrander	
2. Len Walker	
3. Any witness necessary to rebut the evidence or testimony of any witness offered or designated by any other party but not reasonably anticipated.	
4. Any witness called or designated by any other party.	
	Attorneys' Name(s): Tres Gibbs, Samuel Pendergast
	Attorneys' Phone: (713) 535-5500
	Nature of Proceeding: <i>Hearing on the Ostrand</i> ers' <i>Emergency Motion to Dismiss</i> (Docket No. 29)

EXHIBITS

Ex.#	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Promissory Note (GF# 2200122TW) between Alliance Farm and Ranch LLC (Maker) and Erik C. Ostrander and Darla Ostrander (Payees), dated April 1, 2022				
2	Deed of Trust (GF# 2200122TW) involving Alliance Farm and Ranch LLC (Grantor), Brent A. Lane (Trustee), and Erik C. Ostrander and Darla Ostrander (Beneficiaries), dated April 1, 2022				
3	Closing Statement (File No. 2200122TW), including attachments, involving Alliance Farm and Ranch LLC (Borrower) and Erik C. Ostrander and Darla Ostrander (Sellers and Lenders), for the Property located at A0151 – Cartwright Matthew, Tract 1-A73 Acres, Montgomery County, 5450 Honea Egypt Road, Montgomery, TX 77316				
4	Affidavit of Posting, Filing, and Mailing Notice of Foreclosure Sale (DOC#2025001866 Pages 10), dated December 6, 2024, including attachments.				
5	Substitute Trustee's Deed (DOC # 2025002370), dated January 7, 2024, including attachments.				
6	Farm and Ranch Contract executed on February 27, 2025, by Erik C. Ostrander and Darla R. Ostrander (Sellers) and Nathan Milner (Buyer).				
7	United States Bankruptcy Court Southern District of Texas – Notice of Bankruptcy Filing – PACER.				
8	“Notice of Bankruptcy” filed by Alliance Farm & Ranch, LLC in the 457 th Judicial District Court of Montgomery County, Texas (Cause No. 24-07-11639).				
9	Schedules filed by Alliance Farm & Ranch, LLC on April 4, 2025 (ECF No. 34).				
10	Any Exhibits designated by any other party.				

The Ostranders reserve the right to use any exhibits presented by any other party and to use exhibits not listed here for impeachment or rebuttal purposes at the hearing. The Ostranders also reserve the right to supplement or amend this exhibit list any time prior to the hearing. The Ostranders reserve the right to call any witness designated by any other party, as well as rebuttal witnesses.

Dated: April 9, 2025

Respectfully submitted,

COKINOS | YOUNG

By: /s/ Samuel T. Pendergast

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Counsel for Erik and Darla Ostrander

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2025, a true and correct copy of the foregoing document was served upon all parties via the Electronic Case Filing system for the United States Bankruptcy Code for the Southern District of Texas.

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/s/ Samuel T. Pendergast
Samuel T. Pendergast